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July 14, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Connect America Fund**
WC Docket Nos. 10-90, 14-58 and 14-259
Notice of Ex Parte Presentation

Dear Ms. Dortch:

On July 12, 2016, Jimmy Carr of All Points Broadband and the undersigned, representing the Wireless Internet Service Providers Association (“WISPA”), met with Carol Matthey, Alex Minard, Heidi Lankau and Katie King of the Wireline Competition Bureau (“Bureau”) to discuss the rules proposed in the *FNPRM* in the above-referenced proceeding for competitive bidding in Phase II of the Connect America Fund (“CAF”) program.¹

The WISPA representatives emphasized that the Commission should consider basing bidding weights on percentages of the cost model reserve price or the actual bid, as opposed to a strict numeric value. Using strict numeric values may not account for the large differences in cost model prices and therefore would not be proportionate from one geographic bidding unit to the next. The WISPA representatives also explained that low-latency bids should receive significant bidding credit relative to high-latency bids, because high-latency applications will not support “reasonably comparable” voice service or other real-time, data-intensive services such as video-conferencing. WISPA also noted that it opposed any earmarking or awarding of minimum CAF support to certain states where the price cap carrier exercised its right to decline offered Phase II support.

¹ See *Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 10-90, 14-58 and 14-259 (rel. May 26, 2016) (“*FNPRM*”).



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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran
Counsel to WISPA

cc: Carol Matthey
Alex Minard
Heidi Lankau
Katie King